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MEMO ENDORSED

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BY ECF

Hon. Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

United States v. Christopher Peeples, et al., 23 Cr. 141 (VEC)

Dear Judge Caproni:

I respectfully write on behalf of the defendants who are members of Trial Group 2 in this case – Khalil Bey-Muhammad, Gilbert Huertas, and Anayda Huertas – to request that the deadline for motions *in limine* to be filed, which is currently May 17, 2024, be adjourned until June 10, 2024. This is the second motion for an extension of the *in limine* deadline that the Group 2 defendants have made, as the deadline was previously extended from March 15, 2024 to May 17, 2024. I have conferred with the Government, and the Government consents to this request.

The reason for this request is that the Government extended formal written plea offers to each of the Group 2 defendants earlier this week (the week of May 5), and has presently given each of the Group 2 defendants a deadline of Friday, May 10, at 5:00 p.m. to accept their respective offers. The Government has explained to counsel that it is tethering the expiration date on the plea offers to the current motions *in limine* deadline. The Government has indicated that if the motions *in limine* deadline is extended, then it will extend the expiration date on the plea offers.

Counsel for the Group 2 defendants need more than five days to responsibly discuss with our clients the formal written plea offers that the Government has extended, in order to ensure that the Group 2 defendants have enough time to make their own informed and considered decisions about the offers. In addition, as of last night, undersigned counsel and the Government are engaged in a good-faith discussion about certain aspects of the formal written offer to Mr. Huertas, and those discussions have not yet concluded.



For the reasons discussed above, counsel for the Group 2 defendants respectfully request that the motions *in limine* deadline be extended until June 10, 2024.

Thank you for considering this request.

The deadline for Group 2's motions *in limine* is extended to **June 7, 2024**, with responses due **June 21, 2024**. The Court is highly unlikely to grant further extension requests absent good cause in light of the lengthy extension.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", written in a cursive style.

05/08/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Max Nicholas

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